

AmerenCILCO's, AmerenCIPS', and AmerenIP's  
Response to  
Office of the Illinois Attorney General (AG) Data Requests  
ICC Docket No. 07-0539  
Approval of Energy Efficiency and Demand Response Plan

**AG 3.3** Please state whether the Ameren Companies agree that replacing T12 fluorescent lighting with HPT8 lighting would provide greater savings and greater net benefits than replacing them with standard T8 lighting. If the Ameren Companies do not agree, please explain why not.

**Response:** The Ameren Illinois Utilities agree that savings and net benefits would be greater if T12 lighting is replaced with HPT8 fixtures as opposed to standard T8 lighting.

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**AG 3.5** Please list any and all states the Ameren Companies are aware of that have specific annual kWh goals for ratepayer funded energy efficiency programs established through legislation, or who reward program administrators with shareholder performance incentives.

- a. Of those states, please list each one that permits program administrators to prove they have met their legislatively mandated goals or qualified for shareholder performance incentives based only on prospective deemed savings with no retrospective adjustments made based on monitoring, verification or evaluation findings.

**Response:** No research has been conducted by the Ameren Illinois Utilities or its consultant with respect to the states that have specific kWh goals established through legislation. With respect to the number of states that allow program administrators to be rewarded with shareholder performance incentives, see the report titled *Aligning Utility Incentives with Investment in Energy Efficiency*, attached and identified as AG 3.5 Attach, which provides a list of states offering shareholder incentives. No claim is made that this list is comprehensive.

- a. Neither the Ameren Illinois Utilities nor its consultants are aware of which states permit program administrators to prove they have met their legislatively mandated goals or qualified for shareholder performance incentives based only on prospective deemed savings with no retrospective adjustments made based on monitoring, verification or evaluation findings.

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**AG 3.6** Do the Ameren Companies maintain that a rigorous, well-designed, professional and independent impact evaluation performed by a qualified evaluator of a specific program in a specific market and time period does not provide the best estimate of performance of that program available? If no, please explain why not.

**Response:** The Ameren Illinois Utilities generally agree that a rigorous, well-designed, professional and independent impact evaluation performed by a qualified evaluator of a specific program in a specific market and time period does provide the best estimate of performance of that program available. However, even within the parameters set by use of the terms "well-designed", "professional", "independent" and "qualified evaluator", there remains wide latitude with respect to the conduct of a program evaluation. In particular, professional, independent and qualified evaluators have used quite different approaches to determination of net-to-gross ratios, and these estimates have been in some cases, the subject of considerable controversy. Depending on the funds allocated to particular program evaluations and, within these evaluations, to verification of gross savings, independent measurement of gross savings and estimation of net-to-gross ratios, the "best" estimate of performance may still not be very good. The uncertainty surrounding the estimates might be quite large and/or the methodologies used, including participant and non-participant surveys could be flawed. The quality of estimates generally improves over time as additional evaluations are conducted and sample populations increase.

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**AG 3.7** Do the Ameren Companies maintain that a rigorous, well-designed professional and independent freerider/spillover impact evaluation performed by a qualified evaluator of a specific program in a specific market and time period does not provide the best estimate of freerider/spillover of that program available? If no, please explain why not.

**Response:** See the Ameren Illinois Utilities' Response to the Office of Illinois Attorney General Data Request No. AG 3.6, filed concurrently herewith.

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